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**TECHNICAL REVIEW DOCUMENT**  
**for**  
**OPERATING PERMIT 99OPEP219**  
Waste Management Disposal Services of Colorado, Inc.

Colorado Springs Recycling and Disposal Facility  
Facility ID: 0410157

Prepared by Long B. Nguyen  
Last Revised: April 1, 2002

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Waste Management Disposal Services of Colorado, Inc. ("the source") submitted a fugitive dust permit application to the Division on October 22, 2001 for a piece of property called the Expansion Area. This property is located adjacent to the Colorado Springs Recycling and Disposal landfill. The Division has determined that the landfill and the Expansion Area are a single emission source for permitting purposes. The landfill is permitted under Operating Permit 99OPEP219, which was first issued on April 1, 2001. The source wants to use the clay and the topsoil from the Expansion Area for the final cover design at the landfill. At this point, the source is anticipating that the landfill will be closed in 2006. It is then likely that the earth-moving activities at the Expansion Area will last for approximately four years.

The Division had two options on how this fugitive dust permit application could have been processed. The first option was for the Division to issue a construction permit for the Expansion Area. Once this construction permit is issued, it would get incorporated into the operating permit at a later date. The second option was to modify the operating permit and incorporate the earth-moving activities of the Expansion Area directly into the operating permit, in accordance with the procedures outlined in Colorado Regulation No. 3, Part C. The Division decided that the second option was the most efficient way to process this permit application.

The Division reviewed the regulations and determined that this modification to the operating permit could be processed as a minor modification. In their permit application, the source calculated potential-to-emit fugitive emissions of 60.50 tons/yr for PM and 20.05 tons/yr for PM<sub>10</sub>. These increases in the emissions are greater than the significant thresholds of 25 tons/yr for PM and 15 tons/yr for PM<sub>10</sub>. However, landfills are not one of the 28 listed source categories. Consequently, fugitive emissions from landfills are not counted towards the determination of a significant increase. The increases in emissions from the Expansion Area will reported to the Inventory Unit of the Division.

The following changes were made to the operating permit:

1) Section I, Condition 1.1 – This condition was modified to include the Expansion Area and its earth-moving activities into the permit.

2) Section II, Condition 1.1 - The source submitted a letter to the Division on April 17, 2002, requesting that the frequency of compliance determination, relative to the emission limits, be changed from monthly to annually. EPA's Landfill Gas Estimation Model predicts the amount of gas that is generated from a landfill on an annual basis. Therefore, the use of this model to predict the amount of landfill gas generated on a monthly basis is not appropriate. For this reason, the Division approved the source's request and the Division has modified the compliance determination from monthly to annually in this permit condition.

3) Section II, Conditions 2.1 and 2.2 -These conditions were modified so that the earth-moving activities at the Expansion Area would be subject to the fugitive emissions guidelines in Colorado Regulation No.1.III.D. and the fugitive dust control plan in the permit.